

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

TWAIN E. ROBINSON,
Pro se

Plaintiff,

v.

CITY OF KENOSHA,
KENOSHA POLICE DEPARTMENT
KENOSHA PROFESSIONAL POLICE ASSOCIATION

DEFENDANTS.

**PLANTIFF TWAIN ROBINSON RESPECTFULLY CROSS MOVES FOR
SUMMARY JUDGEMENT AND OPPOSITION TO DEFENDANTS MOTION TO
DISMISS**

In support of this cross motion Plaintiff relies on the following statement: A unions duty of fair representation requires it to serve the interests of all union and nonunion bargaining unit members without hostility or discrimination, to exercise this discretion in good faith, and to avoid arbitrary conduct. Del Costello v. International Brotherhood of Teamsters (1983) 462 US 151.

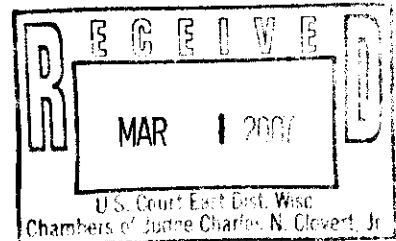
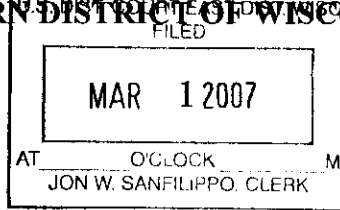
The fact of the matter is that the plaintiff will be able to prove through available evidence that the City of Kenosha discriminated against him and that the KPPA did not fairly represent him.

All issues raised in the defendant's motion are reviewable.

Defendant KPPA cite and rely on decisions from other circuits in contending that plaintiff did not state a claim and that he missed the statute of limitations.

The EEOC's letter giving the plaintiff the right to sue is on file and all procedures were followed in the allotted time granted by the EEOC.

Defendant KPPA contends that plaintiff failed to state a claim upon which relief can be granted.



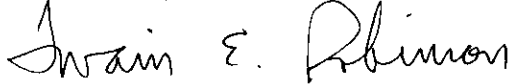
CIVIL ACTION NO. 06-C-1022

I request that my complaint be amended to cure the defect of stating no claim by asking \$150,000.00 in compensatory damages from the KPPA.

I am requesting my initial claim against the city of Kenosha stand as submitted.

Dated this 28th day of February, 2007

Respectfully submitted,

A handwritten signature in cursive script that reads "Twain E. Robinson". The signature is written in black ink and is positioned below the text "Respectfully submitted,".

Twain E. Robinson
Pro se complainant